

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

HEADWATER RESEARCH LLC,

Plaintiff,

v.

Samsung Electronics Co., Ltd., Samsung Electronics America, Inc., Samsung Semiconductor, Inc., and Samsung Austin Semiconductor, LLC,

Defendants.

Civil Action No. 2:24-cv-00228-JRG-RSP

JURY DEMANDED

**AGREED MOTION FOR VOLUNTARY DISMISSAL WITHOUT PREJUDICE OF
DEFENDANTS SAMSUNG SEMICONDUCTOR, INC.
AND SAMSUNG AUSTIN SEMICONDUCTOR, LLC**

Plaintiff and Defendants hereby jointly move to dismiss Defendants Samsung Semiconductor, Inc. and Samsung Austin Semiconductor, LLC from this action pursuant to Federal Rule of Civil Procedure 41(a)(1)(A)(ii). Plaintiff and Defendants have agreed to dismiss Samsung Semiconductor, Inc., and Samsung Austin Semiconductor, LLC without prejudice and without costs pursuant to Rule 41.

The parties agree that the caption should be revised as follows:

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

HEADWATER RESEARCH LLC,

Plaintiff,

v.

Samsung Electronics Co., Ltd., and
Samsung Electronics America, Inc.,

Defendants.

Civil Action No. 2:22-cv-00228-JRG-RSP

JURY DEMANDED

Dated: August 7, 2024

Respectfully submitted,

/s/ Marc Fenster

Marc Fenster
CA State Bar No. 181067
Reza Mirzaie
CA State Bar No. 246953
Brian Ledahl
CA State Bar No. 186579
Ben Wang
CA State Bar No. 228712
Paul Kroeger
CA State Bar No. 229074
Neil A. Rubin
CA State Bar No. 250761
Kristopher Davis
CA State Bar No. 329627
James S. Tsuei
CA State Bar No. 285530
Philip Wang
CA State Bar No. 262239
Amy Hayden
CA State Bar No. 287026
James Milkey
CA State Bar No. 281283
Jason M. Wietholter
CA State Bar No. 337139
RUSS AUGUST & KABAT
12424 Wilshire Blvd. 12th Floor
Los Angeles, CA 90025
Telephone: 310-826-7474
rak_headwater@raklaw.com

Andrea L. Fair
WARD, SMITH & HILL, PLLC
1507 Bill Owens Parkway
Longview, Texas 75604
Telephone: 903-757-6400
andrea@wsfirm.com

**ATTORNEYS FOR PLAINTIFF,
Headwater Research LLC**

Dated: August 7, 2024

Respectfully submitted,

By: /s/ Ashley A. Bolt

Ruffin B. Cordell
TX Bar No. 04820550
cordell@fr.com
Michael J. McKeon
DC Bar No. 459780
mckeon@fr.com
FISH & RICHARDSON P.C.
1000 Maine Avenue, SW, Ste 1000
Washington, D.C. 20024
Telephone: (202) 783-5070
Facsimile: (202) 783-2331

Thad C. Kodish
GA Bar No. 427603
tkodish@fr.com
Ashley A. Bolt
GA Bar No. 231197
bolt@fr.com
FISH & RICHARDSON P.C.
1180 Peachtree St. NE, Fl. 21
Atlanta, GA 30309
Telephone: (404) 892-5005

Kelly Allenspach Del Dotto
DE Bar No. 5969
kad@fr.com
FISH & RICHARDSON P.C.
222 Delaware Avenue, 17th Floor
Wilmington, DE 19801
Telephone: (302) 652-5070
Facsimile: (302) 652-0607

Melissa R. Smith
State Bar No. 24001351
Melissa@gillamsmithlaw.com
GILLAM & SMITH, LLP
303 South Washington Avenue
Marshall, Texas 75670
Telephone: (903) 934-8450

ATTORNEYS FOR DEFENDANTS
***SAMSUNG ELECTRONICS CO., LTD SAMSUNG
ELECTRONICS AMERICA, INC., SAMSUNG
SEMICONDUCTOR, INC., AND SAMSUNG
AUSTIN SEMICONDUCTOR, LLC***

CERTIFICATE OF SERVICE

I certify that this document is being served upon counsel of record for Defendants on August 7, 2024 via ECF.

/s/ Marc Fenster
Marc Fenster